

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application in compliance for allowance. The present amendment is made to facilitate prosecution of the application.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1-21 are pending in this application. Claims 1, 8, and 15 are independent. Claims 1, 2, 8, 9, and 15 are hereby amended. No new matter has been added. It is submitted that these claims, as originally presented, were in full compliance with the requirements of 35 U.S.C. §112. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112 beyond the remarks herein.

### **II. SUPPORT FOR AMENDMENT IN SPECIFICATION**

Support for this amendment is provided throughout the Specification as originally filed and specifically at paragraph [0133] – [0145] of Applicants' corresponding published application.

[0133] [Operation for Special Effect]

[0134] An operation for a special effect based on the operation of the above-described special-effect selection button on the operation screen displayed by the editing application software will now be described in connection with the controlling of the PCI card 14 and the CPU 34.

[0135] When the selection of a type of special effect and the setting of an effect parameter are performed with the special-effect selection button, an effect starting command is sent from the workstation 1 to the PCI card 14 via the PCI bus and also the set effect parameter is stored in a memory on the motherboard in the workstation 1.

[0136] In the PCI card 14, the effect starting command is input to the controller 28 via the PCI connector 25. In the controller 28, the effect starting command is sent to the CPU 34 via the FIFO circuit 47 (FIG. 4) and the interface 52 (FIG. 4).

[0137] Upon receiving the effect starting command, the CPU 34 causes the effect parameter stored in the memory on the motherboard in the workstation 1 to be input to the controller 28 via the PCI connector 25 and causes the DMA controller 46 (FIG. 4) to write the input effect parameter to the dual-port RAM 53 (FIG. 4).

[0138] Subsequently, the CPU 34 writes a calculation starting instruction, addressed to the CPU 37 in the effector 27, to the dual-port RAM 53.

[0139] The CPU 37 in the effector 27 reads the calculation starting instruction from the dual-port RAM 53. The CPU 37 then reads the effect parameter from the dual-port RAM 53, and causes the read-address generation block 36 to calculate a read address of data for each pixel by using the effect parameter.

[0140] When the read-address generation block 36 completes the calculation, the CPU 37 writes to the dual-port RAM 53 a status which is addressed to the CPU 34 and which indicates that the HDTV data can be received.

[0141] Upon reading the status from the dual-port RAM 53, and the CPU 34 causes the HDTV video data (material A), decoded by the decoder 26 and temporarily stored in the memory 41, to be sent to the color-correction/key-generation circuit 49 (FIG. 4) via the memory controller 42.

[0142] The color-correction/key-generation circuit 49 processes the HDTV video data. The CPU 34 then causes the processed HDTV video data to be sent to the memory control block 35 in the effector 27 via the input/output port 48 (FIG. 4).

[0143] In the memory control block 35 in the effector 27, the HDTV video data is written to the external frame memory 55 (FIG. 5). The HDTV video data is then read from the external frame memory 55 in accordance with the read address computed by the read-address generation block 36 and is sent to the input/output port 48 of the controller 28.

[0144] The effector 27 also performs the above-described processing per one-frame HDTV data within a time period for a predetermined number of frames (e.g., one frame).

[0145] The CPU 34 causes the memory controller 42 to temporarily store the HDTV video data, sent from the effector 27 to the input/output port 48, in the memory 41.

### III. RESPONSE TO REJECTIONS UNDER 35 U.S.C. 103(a)

Claims 1-5, 7-12, 14-19 and 21 were rejected under 35 U.S.C. §103(a) as allegedly anticipated by U.S. Patent No. 6,226,038 to Frink et al. (hereinafter, merely "Frink") in view of Nerwin v. Erlichman 168 USPQ 177<sup>1</sup>.

Applicants response addresses the deficiencies of Frink as a primary reference and also take exception to a rejection based on case law. Indeed, Applicants presume that the citation to case law is merely to assert that the deficiencies of Frink are obvious. Applicants respectfully traverse this assertion by the Office Action.

Claims 6, 13 and 20 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Frink in view of Nerwin v. Erlichman 168 USPQ 177 and further in view of U.S. Patent Application Publication 2002/0168036 A1 to Kim (hereinafter, merely "Kim").

Claim 1 recites, *inter alia*:

"...selection means for selecting a type of special effect and inputting an effect parameter,

wherein, when the type of special effect is selected and the effect parameter is input via special effect selection button on an operation screen of the computer:

an effect starting command is sent to the first PCI card from the computer;

the effect parameter is stored in a memory of the computer;

the effect starting command is then sent to the edit processing means from the first PCI card;

the edit processing means then sends the effect starting command to a central processing unit of the computer;

the central processing unit causes the effect parameter that is stored in the memory of the computer to be sent to the edit processing means;

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<sup>1</sup> Applicants respectfully submit that citation to case law is not an appropriate grounds of rejection and respectfully request the Examiner provide a teaching in the art as a basis of rejection.

the edit processing unit writes the effect parameter to a memory of the edit processing unit;

the central processing unit writes a calculation starting instruction to the memory of the edit processing unit;

the effector reads the calculation starting instruction and reads the effect parameter from the memory of the edit processing unit and calculates a read address of data for each pixel using the effect parameter;

the effector then changes a status in the memory of the effector indicating that the high-definition television video data decompressed by the first decoder is able to be received;

the central processing unit then reads the status in the memory of the effector and causes the high-definition television video data decompressed by the first decoder to be sent to the effector;

the effector performs processing per one frame of the high-definition television video data decompressed by the first decoder within a time period for a predetermined number of frames..”

Applicants submit that neither Frink nor Nerwin v. Erlichman 168 USPQ 177, taken alone or in combination, that would disclose or render predictable the above identified features of claim 1. Specifically, neither of the references used as a basis for rejection discloses or renders predictable “selection means for selecting a type of special effect and inputting an effect parameter, wherein, when the type of special effect is selected and the effect parameter is input via special effect selection button on an operation screen of the computer; an effect starting command is sent to the first PCI card from the computer; the effect parameter is stored in a memory of the computer; the effect starting command is then sent to the edit processing means from the first PCI card; the edit processing means then sends the effect starting command to a central processing unit of the computer; the central processing unit causes the effect parameter that is stored in the memory of the computer to be sent to the edit processing means; the edit processing unit writes the effect parameter to a memory of the edit processing unit; the central processing unit writes a calculation starting instruction to the memory of the edit processing unit;

the effector reads the calculation starting instruction and reads the effect parameter from the memory of the edit processing unit and calculates a read address of data for each pixel using the effect parameter; the effector then changes a status in the memory of the effector indicating that the high-definition television video data decompressed by the first decoder is able to be received; the central processing unit then reads the status in the memory of the effector and causes the high-definition television video data decompressed by the first decoder to be sent to the effector; the effector performs processing per one frame of the high-definition television video data decompressed by the first decoder within a time period for a predetermined number of frames”, as recited in claim 1.

Therefore, Applicants submit that independent claim 1 is patentable and respectfully request reconsideration and withdrawal of the rejection.

For reasons similar to, or somewhat similar to, those described above with regard to independent claim 1, independent claims 8 and 15 are also patentable, and Applicants thus respectfully request reconsideration of the rejections thereto.

#### **IV. DEPENDENT CLAIMS**

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Applicants thereby respectfully request reconsideration and withdrawal of rejections thereto. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

### CONCLUSION

Because Applicants maintain that all claims are allowable for at least the reasons presented hereinabove, in the interests of brevity, this response does not comment on each and every comment made by the Examiner in the Office Action. This should not be taken as acquiescence of the substance of those comments, and Applicants reserve the right to address such comments.


In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

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In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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